

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

WOONASQUATUCKET RIVER  
WATERSHED COUNCIL, *et al.*,

*Plaintiffs,*

v.

DEPARTMENT OF AGRICULTURE,  
*et al.*,

*Defendants.*

Case No. 1:25-cv-00097-MSM-PAS

**NOTICE OF FURTHER FACTUAL DEVELOPMENT**

Plaintiffs submit this notice to update the Court concerning the declarant whose IIJA funding from the Department of Energy (DOE) has been frozen for two months. *See* Ex. T, ECF No. 26-11; Ex. Y, ECF No. 32-3. Plaintiffs' reply brief noted that the declarant had heard from the state agency through which its grant money passes that DOE had resumed accepting claims for payment, but that the declarant had not yet received funds. Reply, ECF No. 32, at 3. On April 1, the day after Plaintiffs filed that reply brief, the declarant received a payment of funds via the state agency.

Dated: April 2, 2025

Respectfully submitted,

/s/ Miriam Weizenbaum

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\* admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

On April 2, 2025, I caused the foregoing and accompanying materials to be served on all Defendants through the CM/ECF system.

/s/ Miriam Weizenbaum  
Miriam Weizenbaum